

Before the Federal Communications Commission

Washington, D.C. 20554

In the Matter of

TV Ratings System and the
Oversight Monitoring Board
MB Docket No. 19-41

I. Introduction

These reply comments respond to the initial comments filed in this proceeding concerning the effectiveness and potential evolution of the TV Parental Guidelines and the TV Parental Guidelines Monitoring Board (“TVOMB”).

Commenters across the record raise important concerns about preserving parental authority, free expression, and constitutional safeguards. Those principles should remain central. At the same time, many filings overstate both the limits of the Commission’s authority and the risks associated with neutral, transparency-enhancing improvements to the ratings system.

The record reflects broad agreement that the current system is valuable and that parents, not the government, should make viewing decisions. However, disagreement persists about whether the Commission may, consistent with its authority and the First Amendment, evaluate and encourage improvements to ensure that the ratings system remains accurate, transparent, and responsive to a rapidly evolving media landscape.

The bulk of public comments filed during the open comment period appear to focus on one statement and two related questions in the Public Notice concerning gender identity themes in programming for young audiences. Those comments merit consideration, and we will address those points in this reply comment; but they do not exhaust the scope of this proceeding.

The Public Notice asked a broader set of questions about whether the TV Parental Guidelines remain transparent, consistently applied, and meaningfully accountable to parents and the public. On those issues, many commenters offered little or no substantive response.

That omission is significant. The Commission did not ask only whether particular content should trigger a particular rating. It also asked whether the TVOMB adequately engages the public, whether its composition reflects perspectives outside the entertainment industry, whether parents understand the complaint process and the V-chip, and whether ratings are applied consistently across broadcasters, MVPDs, streaming platforms, and programmers. These questions go to the basic credibility and usefulness of the ratings system.

The record therefore should not be treated as resolving the broader issues simply because some commenters objected to discrete questions in the Public Notice. To the contrary, the absence of meaningful engagement on these broader issues underscores the need for continued Commission attention to transparency, public participation, and consistency across platforms.

A voluntary ratings regime can serve parents only if it is understandable, consistent, and responsive.

Comment Docket Not Reflective of Public Opinion

This docket has invited an unusually high volume of public comments; but the ratio of comments for and against should not be construed as representative of where the public at large stands on these questions.

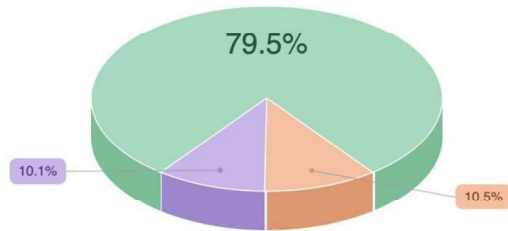
In a Zogby Analytics poll commissioned by Concerned Women for America (CWA), when asked, “How important is it for children's programs to include content labels to advise parents of the presence of content they might want to avoid—such as violence, sexual content, or other sensitive themes like LGBTQ messaging or characters—so parents can make informed choices?” Eighty-seven percent (87%) of respondents said either “very important” or “somewhat important.” Only 5.3% said, “not important at all.”

In response to the question, “Do you think the current television and streaming ratings system is too controlled by the entertainment industry, or does it fairly represent the views of parents and the public?” “Too controlled by the entertainment industry” was the response of 40.9% of the respondents. Only 31.5% responded that it “fairly represents parents and the public.”

Finally, in response to the question, “Would you support or oppose reforming the ratings oversight system to include more independent experts, parent groups, and child-advocacy organizations?” “Strongly support” or “somewhat support” was indicated by 79.5% of respondents.

Taken together, these findings caution against treating the comment docket as a proxy for public consensus. They suggest that many parents and members of the public remain concerned about transparency, industry control, and the lack of independent voices in the ratings process. That concern is especially relevant where the content at issue involves sensitive themes directed toward children, including the questions raised in the Public Notice concerning gender identity themes in children’s programming.

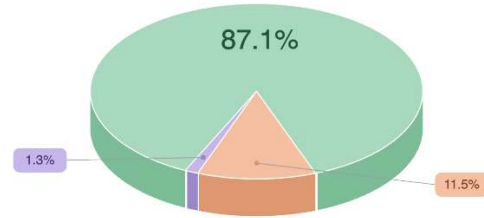
Would you support or oppose reforming the ratings oversight system to include more independent experts, parent groups, and child-advocacy organizations?



Strongly support or somewhat support	79.5%
Somewhat oppose or strongly oppose	10.5%
Not sure	10.1%

WOMEN-AMERICA

How important is it for children's programs to include content labels to advise parents of the presence of content they might want to avoid -- such as violence, sexual content, or other sensitive themes like LGBTQ messaging or characters --so parents can make informed choices?



Very important or somewhat important	87.1%
Not too important or not important at all	11.5%
Not sure	1.3%

WOMEN-AMERICA

Trans Content in Children's Programming

As noted above, a substantial number of comments filed during the initial comment period zeroed in on specific questions about labeling trans and non-binary content in children's programming. The comments often ran along the lines of, "LGBTQ+ people are just people. Their existence doesn't warrant a warning." Others suggested that this proceeding "stigmatizes" and "others" a "marginalized group." Still others commented that "No other groups require warnings" and that "representation matters for LGBTQ youth," and labeling such content is tantamount to censorship.

Those objections misunderstand the issue. The question is not whether such content may exist, but whether parents should receive neutral, accurate notice when programming for children includes themes many families consider sensitive.

For commenters who argue that "LGBTQ+ youth" should be able to see characters and stories that reflect their own experiences, nothing that has been suggested either in the Public Notice nor in the comment docket would foreclose that opportunity. To the contrary, labeling such content could make it easier for parents who approve of such programming to find it.

By extension, the claim that labeling such content would reduce its prevalence reveals one of two possibilities: Either there is far less public demand for this programming than its proponents suggest, and disclosure would cause viewers to opt out, or its advocates understand that parents may object to these messages and they therefore prefer to keep parents in the dark. In either case, the objection is not really to stigma, but to transparency. If the content can withstand public scrutiny, a neutral label should not threaten it. If it cannot, that fact is precisely why parents deserve notice.

But what is unique about this content that it should warrant a label?

The LGBTQ+ community has asserted that trans identification is an immutable characteristic, like race. The very existence of “detransitioners,” like Chloe Cole (who recently testified before the Senate Committee on Health, Education, Labor and Pensions)¹ should put to rest any suggestion that it is an “immutable” characteristic. Meanwhile, there has been a concerted effort to squelch scholarly debate around the issue, and all such attempts have been denounced as transphobic. Despite this, however, a growing body of evidence supports the “social contagion” hypothesis.

Dr. Lisa Littman of Brown University published a peer-reviewed paper in 2018 on the phenomenon of “rapid-onset gender dysphoria” after observing a newly emerging phenomenon of (mostly) teenaged girls with no childhood history of gender dysphoria or sex non-conformity, who suddenly began to identify as transgender when they reached adolescence. Littman observed that trans-identification tended to cluster within friend groups and found that a clear majority of adolescent girls who began to identify as trans during their adolescence had done so after a period of prolonged social-media immersion.²

Trans activists have attempted to silence and deplatform Dr. Littman. Brown University pulled its press release on Dr. Littman’s paper and disavowed her conclusions, but her findings have withstood a secondary review from the academic journal that initially published it, with no changes to the results. Michelle Cretella, the executive director of the American College of Pediatricians noted, “Dr. Littman and her very important work have been doubly vindicated -- essentially having undergone the peer review process twice and coming to the same conclusion.”³

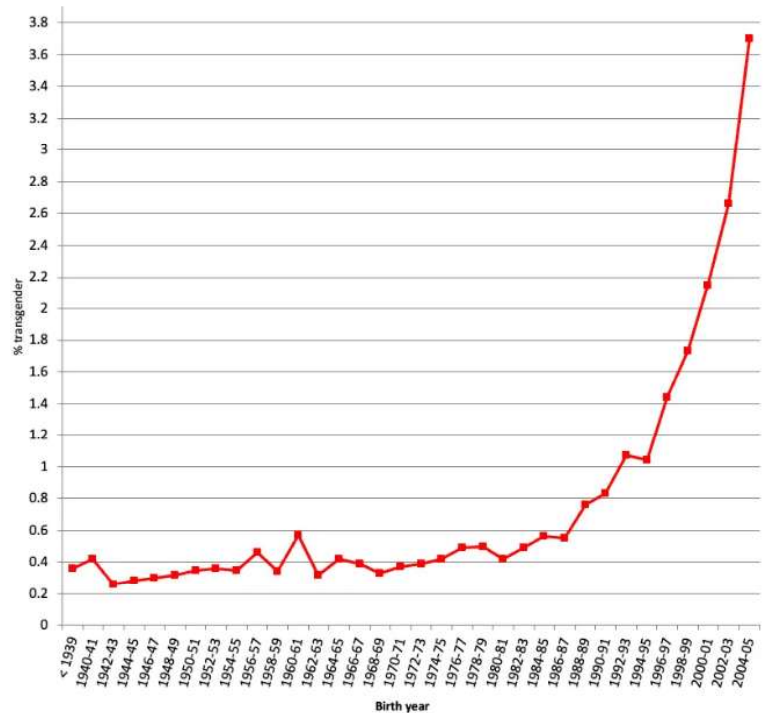
¹ U.S. Senate Committee on Health, Education, Labor and Pensions, Protecting Our Children: Exposing the Dangers of Irreversible Gender Transition Procedures on Minors, June 3, 2026, https://www.help.senate.gov/imo/media/doc/836dcbdb-dc18-2dcd-e758-5033879edf61/Cole%20Testimony_3ff44286-db12-4a99-9427-b8359fe9d51b.pdf

² Littman L (2018) Parent reports of adolescents and young adults perceived to show signs of a rapid onset of gender dysphoria. PLoS ONE 13(8): e0202330. <https://doi.org/10.1371/journal.pone.0202330>

³ Crossland, Kiley. “Rapid-Onset Gender Dysphoria Research Vindicated.” *WORLD*, 22 Mar. 2019, <https://wng.org/roundups/rapid-onset-gender-dysphoria-research-vindicated-1617226327>

Across the Western world, trans-identification has spiked in recent years. Sweden’s Board of Health and Welfare confirmed a 1,500% rise between 2008 and 2018 in gender dysphoria diagnoses among 13-17-year-olds born as girls.⁴ While in the United States, the number of individuals identifying as transgender has grown by 68% in less than a decade.⁵

The trans community would ascribe this spike in trans-identification to growing acceptance, but psychologist Jean Twenge argues that if that were the case, we would expect to see increases across all age groups. The data shows stagnation among older adults, suggesting something else is at play that would disproportionately affect younger cohorts: media exposure.⁶



Twenge points to the proliferation of digital content (YouTube videos, TikTok testimonials, and online forums) as a key vector in shaping youth perceptions of gender.⁷

⁴ Orange, Richard. “Teenage Transgender Row Splits Sweden as Dysphoria Diagnoses Soar by 1,500%.” *The Guardian*, 22 Feb. 2020, <https://www.theguardian.com/society/2020/feb/22/ssweden-teenage-transgender-row-dysphoria-diagnoses-soar>

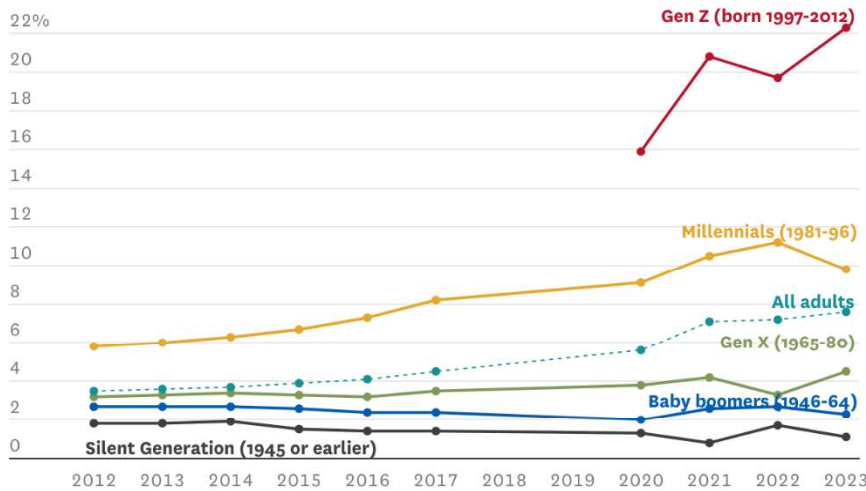
⁵ Twenge, J.M., Wells, B.E., Le, J. *et al.* Increases in Self-identifying as Transgender Among US Adults, 2014–2022. *Sex Res Soc Policy* **22**, 755–773 (2025). <https://doi.org/10.1007/s13178-024-01001-7>

⁶ IBID

⁷ Mújica, Jorge Enrique. “Transgender Identification Surges Among Young Adults: A Generational Shift or a Social Phenomenon?” *ZENIT*, 24 May 2025, <https://zenit.org/2025/05/24/transgender-identification-surges-among-young-adults-a-generational-shift-or-a-social-phenomenon/>

Social science has long affirmed media’s role in shaping youth attitudes, perceptions, behaviors and beliefs around sex and sexuality. Mass Media has been called a “super-peer,” playing a

Percentage of LGBTQ+-identifying adults by generation, 2012-23



Data is based on interviews with about 12,000 people in the U.S. 18 and older. Some year-over-year changes may be due to small sample sizes, so it is best to look at long-term trends.

Chart: Jenny Kwon / The Chronicle - Source: Gallup poll data

Figure 1 Source: <https://www.sfchronicle.com/us-world/article/lgbtq-poll-gallup-19361873.php>

formative role in adolescent socialization. Unlike family, school, community institutions, or the legal system, media are sources of social influence over which adolescents exercise far greater personal choice and control. As a result, young people engage in a meaningful degree of self-socialization, selecting from a wide array of media content those messages and narratives that align with their own interests, preferences, and personalities. This dynamic can also fragment adolescent socialization, because media and peer influences may communicate values or expectations that diverge from those conveyed by the adults and institutions in a

young person’s immediate environment.⁸

While no single factor explains the surge in LGBTQ identification among adolescents, media exposure is a well-documented variable in shaping norms, identity exploration, and worldview formation. When representation for a small demographic reaches near-ubiquity in children’s content, it naturally raises questions about whether entertainment platforms are shaping identity rather than reflecting it, and it therefore warrants closer scrutiny.

Social Contagion Concerns Necessitate Additional Content Warnings

The relevance of social contagion is not theoretical. About a month before the first-season release of *13 Reasons Why*, a Netflix drama based on a Young Adult novel about a high school girl who commits suicide and leaves behind a series of tapes explaining her reasons for taking her own life, the streamer contacted Dan Reidenberg, a psychologist and the executive director of Suicide Awareness Voices of Education and asked him to provide guidance. Reidenberg advised Netflix *against* going ahead with the series.

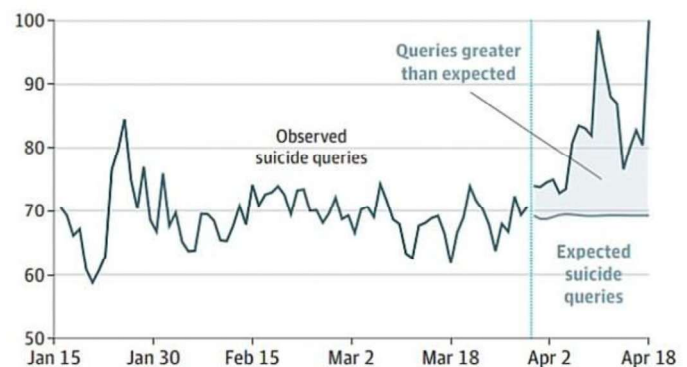
⁸ Arnett, J.J. Adolescents' uses of media for self-socialization. *J Youth Adolescence* **24**, 519–533 (1995). <https://doi.org/10.1007/BF01537054>

But Netflix ignored that advice and released it anyway.⁹

After the first season dropped, the American Foundation for Suicide Prevention, the country's largest suicide prevention nonprofit, as well as leaders from the American School Counselor Association and the National Association of School Psychologists, warned that the series could lead to suicide contagion.¹⁰ Their concern was not that suicide had been depicted at all, but that a graphic portrayal, distributed to a youth audience without adequate warning or safeguards, could encourage imitation among vulnerable viewers.

Suicide contagion is a well-documented phenomenon, so much so that it is sometimes called "The Werther Effect" in reference to a spate of suicides following the publication of Goethe's *The Sorrows of Young Werther* in the 18th century.¹¹ According to the National Institutes of Health: "The Netflix show '13 Reasons Why' was associated with a 28.9% increase in suicide rates among U.S. youth ages 10-17 in the month (April 2017) following the show's release, after accounting for ongoing trends in suicide rates."¹²

Another study examined Internet trends following the show's premiere and found that terms related to "suicide" increased by 19 percent, equaling between 900,000 and 1.2 million more Google searches than normal. Most of these searches were about suicide ideation, including ways to die by suicide.¹³ That spike in behavior following exposure is precisely the kind of contagion concern that should trigger careful pre-release review and clear, advance notice to parents.



⁹ Eisenstadt, Marnie. "13 Reasons Why' Is a Hit, but Suicide Expert Told Netflix Not to Release Series." *Syracuse.com*, 26 Apr. 2017, www.syracuse.com/entertainment/2017/04/suicide_expert_consulted_by_netflix_on_13_reasons_why_told_t_hem_not_to_release_i.html

¹⁰ Kutner, Max. "Suicide Prevention Expert on '13 Reasons Why': 'Contagion Is a Real Concern Here.'" *Newsweek*, 2 May 2017, <https://www.newsweek.com/netflix-13-reasons-why-suicide-contagion-experts-593367>

¹¹ Bateson, John. "The Werther Effect Is Real." *Psychology Today*, 3 Mar. 2026, <https://www.psychologytoday.com/us/blog/goodbye-suicide/202603/the-werther-effect-is-real>

¹² Bridge, J. A., Greenhouse, J. B., Ruch, D., Stevens, J., Ackerman, J., Sheftall, A. H., Horowitz, L. M., Kelleher, K. J., & Campo, J. V. (in press). Association between the release of Netflix's *13 Reasons Why* and suicide rates in the United States: An interrupted times series analysis. *Journal of the American Academy of Child and Adolescent Psychiatry*.

¹³ Ayers JW, Althouse BM, Leas EC, Dredze M, Allem J. Internet Searches for Suicide Following the Release of *13 Reasons Why*. *JAMA Intern Med*. 2017;177(10):1527–1529. doi:10.1001/jamainternmed.2017.3333

Netflix eventually responded to public criticism and cut the scene,¹⁴ but some would argue it was too little too late, at least two teenage girls had already taken their lives, inspired, their families alleged, by their viewing of *13 Reasons Why*.¹⁵

The lesson for this proceeding is not that every difficult subject must be barred from programming. It is that content decisions affecting children can have serious consequences when platforms operate without meaningful review, public accountability, or timely input from independent experts. Netflix received warnings before *13 Reasons Why* aired but proceeded anyway and took steps to mitigate the harm only after public criticism and alleged harm. A more transparent and accountable ratings system, with meaningful outside participation before content reaches young audiences, would better serve parents and reduce the risk that warnings arrive only after the damage is done. This example also demonstrates why the Commission should consider whether any modernized ratings framework must account for streaming services, where children increasingly encounter influential content outside the traditional broadcast and cable structures for which the current system was designed.

Lack of Viewpoint Diversity Within the TVOMB

In the FCC's Report and Order in the matter of Implementation of Section 551 of the Telecommunications Act of 1996, the Commission notes that concerns were raised about the composition of the Television Parental Guidelines Oversight Monitoring Board (TVOMB) from the very beginning, and then states that in response to those concerns, the Industry agreed to add "5 non-industry members, drawn from the advocacy community, to the board." The Report and Order continues, "While some commenters raise concerns that the board, with 19 industry members is still unbalanced," the Commission concluded that "the addition of representatives from the advocacy community will provide an important voice for non-industry interests and will permit useful oversight of the rating system."¹⁶

However, despite the Commission's reassurances, those concerns persisted without redress for the better part of two decades.

Section 551 of the Telecommunications Act of 1996 reflects Congress's judgment that a parental ratings system should not be designed or controlled solely by the industries subject to it. Congress directed that "parents," "appropriate public interest groups," and "other interested individuals from the private sector" be involved in developing the ratings system and further required that the

¹⁴ Bradley, Laura. "'13 Reasons Why' Finally Listens to Experts, Removes Suicide Scene." *Vanity Fair*, 16 July 2019, <https://www.vanityfair.com/hollywood/2019/07/13-reasons-why-suicide-scene-edited>

¹⁵ "2 Families Endure Suicides, Blame Popular Netflix Show." *KTVU FOX 2*, 26 June 2017, <https://www.ktvu.com/news/2-families-endure-suicides-blame-popular-netflix-show>

¹⁶ Federal Communications Commission, *Implementation of Section 551 of the Telecommunications Act of 1996: Video Programming Ratings*, FCC 98-35, CS Docket No. 97-55, ¶¶ 16, 23 (1998).

advisory committee be “fairly balanced in terms of political affiliation” and “the points of view represented.”¹⁷

That commitment to balance should not disappear once the ratings system moves from creation to oversight. If anything, it becomes more important. Congress did not require a parental ratings system so that the industry whose programming practices made such a system necessary could retain near-exclusive control over the standards, oversight, and accountability mechanisms designed to serve parents and protect children.

In its own defense, Industry Representatives explained in their public comment filed on Docket 19-41 in the Matter of Implementation of the Consolidated Appropriations Act of 2019 that the TVOMB has a process for adding non-industry members to the Board, and that the process includes “vetting” organizations, “receiving input” from existing board members, and “discussion among the trade associations and the executive secretariat.”¹⁸

This is less a model for viewpoint diversity than a regulatory version of the cafeteria table in *Mean Girls*: those already seated decide who is allowed to sit with them. That may produce harmony among existing members, but it does not ensure that excluded viewpoints, skeptical parents, or genuinely independent public-interest voices have a meaningful seat at the table.

The Industry Representatives further defend composition of the board, claiming members “represent a cross-section of organizations that deal with parents and children, consumers and media.” But this is not truly the case.¹⁹

In comments filed on Docket 19-41 in the Matter of Implementation of the Consolidated Appropriations Act of 2019; Report on Television Ratings and The Oversight Monitoring Board, comments pointed out that “The makeup of the 24-member TVOMB is, per paragraph 10 of the FCC’s Report and Order, to include ‘five non-industry members from the advocacy community.’ Based on a review of the TVOMB website, two of those five non-industry members are Call for Action and Entertainment Industries Council, both of which are industry-controlled and industry-funded organizations that have nothing to do with parents, families or advocacy about age-inappropriate content. This Board composition violates both the spirit and the letter of the FCC’s Report and Order.”²⁰

¹⁷ United States, Congress. *Telecommunications Act of 1996*. Pub. L. 104-104, 110 Stat. 56, 1996.

¹⁸ Motion Picture Association of America, et al. *Ex Parte Supplemental Filing*. MB Docket No. 19-41, Federal Communications Commission, 16 Apr. 2019.

¹⁹ *IBID*

²⁰ Parents Television Council. *Public Comment*. MB Docket No. 19-41, Federal Communications Commission, 2019.

The only other non-industry-aligned groups currently sitting on the Oversight Monitoring Board are the American Academy of Pediatrics,²¹ Boys and Girls Clubs of America²² and the National PTA,²³ all organizations that have been ideologically captured by the progressive left, especially on questions of gender identity.

If the AAP is on the Board, why is the American College of Pediatricians not also on the board?

If the National PTA is on the Board, why is the National Association of Homeschoolers not also on the Board?

Why has the National Association of Religious Broadcasters not been invited to join the Board?

Silence Does Not Mean Satisfaction

In a joint public comment, the Motion Picture Association (MPA), National Association of Broadcasters (NAB), and NCTA – The Internet & Television Association offer “the low number of ratings complaints” as evidence that the system works as Congress intended.²⁴

The low volume of complaints, however, may say less about satisfaction with the existing system than it does about the general lack of awareness around avenues for consumer redress. The FCC’s own history serves as an illustration of this likelihood. The FCC first allowed consumer complaints about broadcast decency violations in 1973, with the George Carlin case in 1973–1975 being the first documented instance, and the 1978 *Pacifica Foundation* decision cementing the practice.

Prior to 2003, indecency complaints were relatively modest and sporadic. Not because viewers found nothing to object to, but because most were unaware of the existence of broadcast decency

²¹ American Academy of Pediatrics. “AAP Reaffirms Gender-Affirming Care Policy, Authorizes Systematic Review of Evidence to Guide Update.” *AAP News*, 3 Aug. 2023, <https://publications.aap.org/aapnews/news/25340>

²² Boys & Girls Clubs of America. *Empower LGBTQ Youth Through Inclusive Practices*. <https://positiveplace.org/empower-lgbtq-youth-through-inclusive-practices/>

²³ National Parent Teacher Association. *Resolution: Protection of and Support for LGBTQ+ Individuals*. 2019, <https://www.pta.org/home/advocacy/ptas-positions/Individual-PTA-Resolutions/protection-of-and-support-for-LGBTQ-individuals>

²⁴ Motion Picture Association, National Association of Broadcasters, and NCTA – The Internet & Television Association. *Joint Comments on the TV Ratings System and Oversight Monitoring Board (MB Docket No. 19-41)*. Federal Communications Commission, 26 May 2022, <https://www.fcc.gov/ecfs/document/10522159905248/1>

laws, that there was a government agency tasked with enforcement of those laws, or that the FCC took no enforcement actions without first receiving a complaint.

This changed sharply beginning in mid-2003, when organizations like Concerned Women for America and the Parents Television Council (PTC) intensified outreach efforts and public education campaigns to notify consumers about their rights and introduced tools such as online complaint portals that made it far easier for individuals to file complaints by removing the bureaucratic obstacles, such as requiring a tape or transcript of the offending broadcast. Following these developments, complaint volumes surged dramatically. In the years after 2003, the FCC began receiving tens of thousands to hundreds of thousands of complaints in single months, with events like the 2004 Super Bowl halftime show generating well over half a million complaints.²⁵ Until January 2004, the FCC had never fined one television station in the continental United States for airing indecent material.

As Thomas Jefferson rightly observed when writing the Declaration of Independence, “mankind are more disposed to suffer, while evils are sufferable, than to right themselves by abolishing the forms to which they are accustomed.” Put plainly, the average person will go along with the *status quo* for a long time, even if they are unhappy with it, especially if complaining or seeking redress is difficult or burdensome. Silence or inaction should not be construed as satisfaction or endorsement of the system as it currently exists.

Lack of Consistency Widespread and Well-Documented



Recent data compiled by the video filtering service VidAngel illustrates how little practical guidance the current ratings system provides to parents. In a marketing email asking, “What even is TV-14?,” VidAngel compared programs carrying the same age-based rating and found dramatic disparities in the amount and type of objectionable content. For example, among TV-14 programs, the reported

²⁵ Lasar, Matthew. “Activists Focused on GTAIV? FCC Indecency Complaints Plummet.” *Ars Technica*, 2 July 2008, <https://arstechnica.com/tech-policy/2008/07/activists-focused-on-gtaiv-fcc-indecency-complaints-plummet/>

number of uses of the F-word ranged from zero in *XO, Kitty* to five in *Wednesday*, forty-six in *Cobra Kai*, and 284 in *The Summer I Turned Pretty*. Similar disparities appeared in other categories: reported nudity ranged from zero instances in *My Life with the Walter Boys* to 12 in *Outer Banks* and 20 in *Friday Night Lights*, while reported sexual content ranged from six instances in *To All the Boys I've Loved Before* to 108 in *The Summer I Turned Pretty* and 218 in *Friday Night Lights*.

To take just one series as an example, Netflix's *Stranger Things* saw a 217% increase in profanity and a 307% increase in violence across four seasons, but nothing in the rating would have warned parents that the show became more explicit during that time. *Stranger Things* did not introduce the "f-word" until part-way through its second season, but then used it six times in Season 2, and five times in Season 3, and nine times in Season 4. Historically, a single use of the "f-word" on basic cable and expanded-basic cable television programming has been enough to trigger a "TV-MA" rating.²⁶

These inconsistencies are not isolated errors but reflect structural weaknesses in the self-regulatory ratings process, including vague standards, lack of independent oversight, and conflicts of interest when content distributors rate their own programming. As a result, parents are unable to rely on ratings or descriptors to make informed decisions, particularly in the streaming environment where binge-watching and algorithmic recommendations amplify exposure. PTC argues that without clearer definitions, consistent enforcement, and greater transparency, the TV ratings system cannot effectively serve families, highlighting the need for reform to restore parental trust and meaningful consumer guidance.

Conclusion

The central question before the Commission is not whether particular viewpoints should be promoted or suppressed. It is whether parents are receiving clear, reliable, and meaningful information about the content their children consume, and whether the institutions responsible for administering the ratings system remain accountable to the public they are intended to serve.

The record demonstrates that significant questions remain regarding ratings consistency, public awareness of complaint mechanisms, the representativeness of the TVOMB, and the adequacy of oversight in an increasingly streaming-dominated media environment. These concerns cannot be dismissed simply because portions of the comment record focused on a narrower controversy.

Congress envisioned a ratings framework that would empower parents, incorporate diverse viewpoints, and operate in the public interest. To fulfill that purpose, the Commission should continue examining whether the current system provides sufficient transparency, accountability, and responsiveness to parents' concerns. The Commission should also encourage reforms that expand meaningful public participation, strengthen independent oversight, improve ratings

²⁶ Parents Television and Media Council. *Stranger and More Explicit Things: How Netflix Ratings Fail Parents*. 2022, <https://www.parentstv.org/resources/2022-Stranger-And-More-Explicit-Things.pdf>

consistency across platforms, and ensure that content descriptors provide parents with useful and timely information.

A voluntary ratings system remains an important tool for parental empowerment. But for that system to retain public confidence, it must be transparent, understandable, consistently applied, and genuinely accountable to the families it exists to serve. The Commission should therefore continue its oversight of the TV Parental Guidelines and the TVOMB and pursue measures that strengthen the credibility and effectiveness of the ratings framework for the next generation of media consumers.